

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

K&L Gates LLP

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*Proposed Attorneys for Neelendu and Stephanie Bose*

In re:

NEELENDU and STEPHANIE BOSE,

Debtors.

Chapter 11

Case No. 18-30086-MBK

Judge: Hon. Rosemary Gambardella  
U.S.B.J

Hearing Date: May 6, 2019

Hearing Time: 10:00 a.m.

**APPLICATION FOR RETENTION OF PROFESSIONAL**

1. The applicants, Neelendu and Stephanie Bose (the "Debtors"), are the

☐ Trustee: ☐ Chap. 7 ☐ Chap. 11 ☐ Chap. 13

☒ Debtors: ☒ Chap. 11 ☐ Chap. 13

☐ Official Committee of

2. The applicants seeks to retain the following professional K&L Gates LLP ("K&L") to serve as:

☒ Attorney for: ☐ Trustee ☐ Debtor-in-Possession

☐ Official Committee of

☒ Debtors/Defendants in Adversary Proceeding as Special Litigation Counsel

☐ Accountant for: ☐ Trustee ☐ Debtor-in-Possession

☐ Official Committee of

☐ Other Professional:

☐ Realtor ☐ Appraiser ☐ Special Counsel

☐ Auctioneer ☐ Other (specify):

3. The employment of the professional is necessary because: The Debtors require the retention of special litigation counsel to represent them in connection with the adversary proceeding captioned *Horizon Healthcare Services, Inc., d/b/a Horizon Blue Cross Blue Shield of New Jersey v. Neelendau Bose and Stephanie Bose; Case No.19-01010* (the "Adversary Proceeding").
4. The professional has been selected because: The Debtors have selected K&L Gates LLP due to its considerable experience and knowledge in the subject of the Adversary Proceeding, in bankruptcy law generally, and in other areas of law related to the effective representation of the Debtors in this case. The Debtors contend that K&L Gates LLP is well qualified to represent the Debtors in the Adversary Proceeding.
5. The professional services to be rendered as follows: Representation of the Debtors as special litigation counsel in the Adversary Proceeding, including, but not limited to, all necessary court appearances, research, preparation and drafting of pleadings and other legal documents, hearing preparation and related work, negotiations and advice, and trial if necessary.
6. The proposed arrangement for compensation is as follows: Subject to Bankruptcy Court approval, K&L Gates LLP will be compensated at its standard hourly rates as set forth in

the Certification of Daniel M. Eliades, Esq. The rates are subject to change on an annual basis. The Debtors have paid K&L Gates LLP a retainer totaling \$25,000. The Debtors have agreed to pay an additional \$10,000 towards the retainer. The source of these funds were the Debtors.

7. To the best of your Applicant's knowledge, the professional's connection with the Debtors, creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee, is as follows:

☒ None

☐ Describe connection:

8. To the best of the applicant's knowledge, the professional (check all that apply):

☒ does not hold an adverse interest to the estate.

☒ does not represent an adverse interest to the estate.

☒ is a disinterested person under 11 U.S.C. § 101(14).

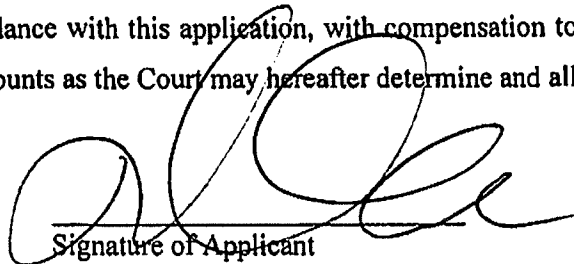
☒ does not represent or hold any interest adverse to the debtor or the estate with respect to the matter for which he/she will be retained under 11 U.S.C. § 327(e).

☐ Other; explain:

9. If the professional is an auctioneer, appraiser or realtor, the location and description of the property is as follows: N/A

WHEREFORE, the applicant respectfully requests authorization to employ the professional to render services in accordance with this application, with compensation to be paid as an administrative expense in such amounts as the Court may hereafter determine and allow.

Date: March 20, 2019

  
Signature of Applicant

Neelendu Bose

Name of Applicant

Date: March 20, 2019

  
Signature of Applicant

Stephanie Bose

Name of Applicant